

**FILED**

**March 25, 2020**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

KAREN MITCHELL  
CLERK, U.S. DISTRICT  
COURT

UNITED STATES OF AMERICA

v.

No. 7:20-mj-011-BP

GAVIN WESLEE BLAKE PERRY

CRIMINAL COMPLAINT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

**Alleged Offense**

On or about March 23, 2020, in the Northern District of Texas, the defendant, **Gavin Weslee Blake Perry**, knowingly and willfully did transmit in interstate and foreign commerce, via a Facebook internet account, a communication to the general public containing a threat to injure another person, namely Nancy Pelosi, specifically to cause injury to her person, all in violation of 18 U.S.C. § 875(c).

**Introduction**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and am authorized to investigate violations of the laws of the United States. I have been employed as an FBI Special Agent since 2005 and am assigned to the Wichita Falls Resident Agency (WFRA) of the Dallas Division of the FBI. I am assigned to the Safe Streets Task Force (SSTF), which investigates interstate threats, extortions, bank robberies, kidnappings, fugitives, and Hobbs Act robberies, among other violations of federal law.
2. I make this affidavit in support of an application for a complaint and arrest warrant for **Gavin Weslee Blake Perry**, for violating 18 U.S.C. § 875(c). I base the facts set forth in this affidavit upon my personal knowledge, information obtained during my participation in this investigation, review of documents, knowledge obtained from other individuals including law enforcement personnel, and communications with others who have personal knowledge of the events and circumstances described herein. Because this affidavit is being submitted for the limited purpose of enabling this Court to make a judicial determination of probable cause to issue an arrest warrant, I have not included

each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish the legal basis for the issuance of an arrest warrant.

### Probable Cause

3. On or about March 23, 2020, at 11:22 a.m., a person using Facebook account "Gavinwbperry" posted a comment on the internet. The comment stated to the effect (errors in original):

If youre a dem or apart of the establishment in the democrats side I view you as a criminal and a terrorists and I advise everyone to Go SOS and use live rounds. This is not gonna change until we attact NSA The DOJ the FBI and Any other agencies who want to get involved. Shoot to kill. This is a revolution. This is our world we just allow you to live it in. You will all remember that when we are done with you!

4. On or about March 23, 2020, at 12:59 p.m., a person using the same Facebook account posted another comment, attached to an image of United States House of Representatives Speaker of the House Nancy Pelosi. The comment stated to the effect (errors in original):

Nancy Pelosi is apart of a satanic cult and so are the people who work closly with her. Dems of the establishment will be removed at any cost necessary and yes that means by death.

5. After a concerned citizen notified the Wichita Falls Police Department (WFPD) of the online threats, Task Force Officer (TFO) Bradley Sanchez and Affiant began to investigate the origin of the threatening comments. Due to the life-threatening nature of the threats, Facebook provided the FBI with subscriber records for the Gavinwbperry account. The records indicated that the creator of the account had identified himself to Facebook as **Gavin Weslee**. A search of WFPD records and other law enforcement and public databases identified a possible suspect as **Gavin Weslee Blake Perry**.

6. Investigators began an effort to locate **Perry**, who was linked to several possible addresses in Wichita Falls, Texas. After conducting a number of interviews at various locations, TFO Sanchez and Affiant arrived on March 25, 2020 at approximately 3:00 p.m. at a residence on Lindale Drive in Wichita Falls, Texas. After Affiant knocked on the door, **Perry** responded and opened the door. Affiant presented his FBI credentials and introduced TFO Sanchez as a WFPD officer assigned to an FBI task force. Affiant explained an investigation was being conducted into threatening comments posted on Facebook earlier in the week. **Perry** appeared to understand the purpose of Affiant's visit, even as Affiant explained it to him. In response to questioning, **Perry**

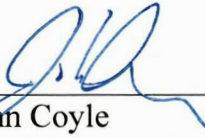
acknowledged he was the user of Facebook account Gavinwbperry. Affiant showed **Perry** screen-shots of the threatening comments, as described in paragraphs three and four of this affidavit. **Perry** said his use of the term “SOS” in the posting described in paragraph three meant “shoot on sight.” **Perry** acknowledged having authored the comments, as he had been posting warnings to all Americans to beware of the government, which **Perry** stated he believes is tyrannical.

7. After **Perry** verbally admitted to investigators that he had been the author of the threatening Facebook comments, as described above, Affiant read to **Perry** his Constitutional Rights. **Perry** acknowledged he understood his rights, but refused to answer further questions. At this point, **Perry** was placed in custody without incident. During preparations for transportation to the Wichita County Jail, **Perry** made several *res gestae* statements. **Perry** said Affiant was violating his First Amendment right to free speech, and such a violation is punishable by death. **Perry** said he intends to bond out of jail, and never to comply with any order to come to court. **Perry** said he does not recognize the authority of the federal government, and that he desires to leave the country and to never return. **Perry** was transported to the Wichita County Jail, pending the filing of a federal complaint.

8. Affiant knows Facebook, Inc. to be a social media tool on the worldwide internet, which allows account users to communicate across state lines and internationally. Facebook Corporation is based in California and is a business engaged in interstate and foreign commerce.

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Based upon the above facts and circumstances, Affiant respectfully submits that there is probable cause to believe that **Gavin Weslee Blake Perry**, knowingly and willfully did transmit in interstate and foreign commerce, via a Facebook internet account, a communication containing a threat to injure another person, in violation of 18 U.S.C. § 875(c).

  
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John Coyle  
Special Agent, U.S. Federal Bureau of Investigation

Sworn to before me and signature confirmed via reliable electronic means,  
pursuant to Fed. R. Crim. P. 4.1, on this 25th day of March, 2020, at \_\_\_\_\_  
9:48 a.m. / p.m., in Wichita Falls, Texas.

  
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Hal R. Ray, Jr.  
UNITED STATES MAGISTRATE JUDGE